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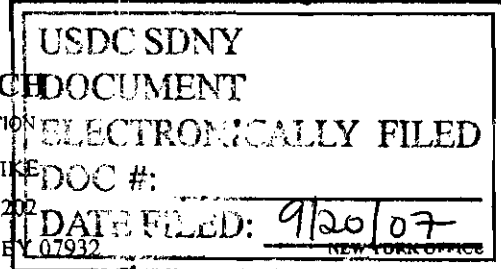
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September 19, 2007
MEMO ENDORSED

Via Fax Only (212) 805-7906
Honorable Denny Chin, U.S.D.J.
United States District Court
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Zurich American Ins. Co. v. Piedmont Express, Inc.; 07 Civ. 6514 (DC)

Dear Judge Chin:

This office represents Defendant, Piedmont Express, Inc. ("Defendant"), in connection with the above referenced matter.

As a follow up to Defendant's motion for an extension of time to answer which was electronically filed on September 18, 2007, and pursuant to the instructions of your Honor's chambers on even date, this letter is being submitted to respectfully request an extension of time to file an answer to Plaintiff's complaint of at least twenty (20) days to October 8, 2007.

Defendant is located in North Carolina. This office first received this matter from North Carolina counsel, Nancy L. Huegerich, Esq., on Monday evening of September 17, 2007. Ms. Huegerich requested consent for an extension from Plaintiff, but Plaintiff's counsel, James J. Ruddy, Esq., refused. Defendant was served with the Summons and Complaint in this action on August 29, 2007, and its answer was due on September 18, 2007. In light thereof, Defendant was unable to assemble the information required for

Approved, to 10/8/07.

SO ORDERED. 
9/20/07

LAW OFFICES

POE & FREIREICH, P.A.

Honorable Denny Chin, U.S.D.J.

United States District Court

Southern District of New York

September 19, 2007

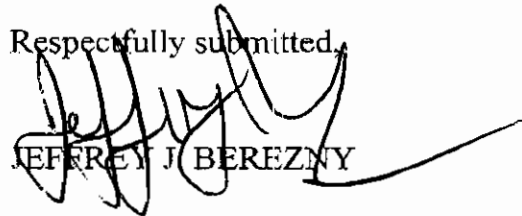
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filing an initial responsive pleading by September 18, 2007.

Accordingly, Defendant respectfully requests the foregoing extension of time to answer Plaintiff's Complaint. By copy of this letter to our adversary, James J. Ruddy, Esq., Plaintiff is hereby being notified of same.

Thank you for your Honor's attention in this regard. If you should have any questions, please do not hesitate to contact me.

Respectfully submitted,



JEFFREY J. BEREZNY

JJB/hbh

cc: James J. Ruddy, Esq. via fax only (212) 376-6488

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